

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

~~~~~

JILL M. BECKMAN,

Plaintiff,

vs. Case No. 1:18-cv-00985

GUARDANT HEALTH, INC.,

Defendant.

~~~~~

Deposition of  
JILL BECKMAN

February 11, 2019  
9:59

Taken at:  
Littler Mendelson, PC  
Oswald Centre  
1100 Superior Avenue  
East, 20th Floor  
Cleveland, Ohio  
Tracy Morse, RPR

1 A. No.

2 Q. So misconduct wasn't different than  
3 what you reported for your reason for leaving  
4 Guardant?

5 MR. BALES: Object to form.

6 You can answer.

7 A. Two things. I was totally in shock  
8 by what transpired. I was honest in terms of  
9 what, "Misconduct," meant. I did not even  
10 think about what I put down there nor did he  
11 ask me what I put down. I didn't have this in  
12 front of me. I didn't recall. I was in shock  
13 as far as possibly losing the job and trying to  
14 take care of my husband. Who was terminally  
15 ill. So it was very devastating on that day.  
16 And all he asked me to do was define,  
17 "Misconduct."

18 Q. Okay. So at what point did you  
19 realize that the reason Guardant Health  
20 reported was different than what you reported  
21 for a reason for leaving?

22 A. I didn't recognize that even when I  
23 looked at this, because my territory was  
24 downsized, so I didn't even recognize that  
25 there was a difference when they sent me the

1 Justifacts report. All I did was look at,  
2 "Misconduct," who provided the information and  
3 waited for Bayer's next steps.

4 Q. But you see today that there's a  
5 difference in what was reported between you and  
6 what was reported by Guardant, correct?

7 A. Yes.

8 Q. Earlier today you stated that the  
9 reason you left Guardant had nothing to do with  
10 your territory, correct?

11 A. I don't remember.

12 Q. Well, when we looked at the  
13 separation documents -- wait, I'll find it --  
14 Exhibit 14 --

15 A. I don't have them memorized.  
16 Sorry.

17 Q. That's all right. The third page  
18 of Exhibit 14, GH 00019 --

19 A. Okay. Thank you.

20 Q. -- where it says, the first full  
21 sentence from the top, "Terminated due to  
22 violating a first and final written warning,"  
23 that's different than the response you provided  
24 on Exhibit 20 under, "Applicant Info," on  
25 Beckman 000348, correct?

REPORTER'S CERTIFICATE

The State of Ohio, )

SS:

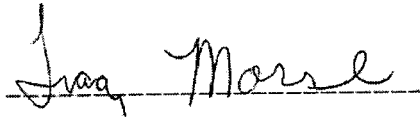
County of Cuyahoga. )

I, Tracy Morse, a Notary Public within and for the State of Ohio, duly commissioned and qualified, do hereby certify that the within named witness, JILL BECKMAN, was by me first duly sworn to testify the truth, the whole truth and nothing but the truth in the cause aforesaid; that the testimony then given by the above-referenced witness was by me reduced to stenotypy in the presence of said witness; afterwards transcribed, and that the foregoing is a true and correct transcription of the testimony so given by the above-referenced witness.

I do further certify that this deposition was taken at the time and place in the foregoing caption specified and was completed without adjournment.

1 I do further certify that I am not  
2 a relative, counsel or attorney for either  
3 party, or otherwise interested in the event of  
4 this action.

5 IN WITNESS WHEREOF, I have hereunto  
6 set my hand and affixed my seal of office at  
7 Cleveland, Ohio, on this 3rd day of  
8 April, 2019.

9  
10  
11  
12   
13

14 Tracy Morse, Notary Public  
15 within and for the State of Ohio  
16

17 My commission expires 1/26/2023.  
18  
19  
20  
21  
22  
23  
24  
25